

Exhibit B

DECLARATION OF BARRY M. SEASTEAD

Pursuant to 28 U.S.C. § 1746, I, Barry M. Seastead, hereby declare as follows:

1. I have personal knowledge of the matters in this declaration and this is what I would testify to if called as a witness in Court.

2. I am 68 years old and am otherwise competent to testify.

3. I live in Warren, Pennsylvania, and have lived here since I was 2 years old.

4. I am currently retired. I spent my career as a welder; for 20 years, I worked in a Navy Shop making components for Navy nuclear submarines, and later worked for 10 years as a maintenance welder. Later in my career, I spent 13 years working for the Warren County Assessment Office as a Field Assessor assessing properties for tax purposes.

5. I have been a registered voter in Warren County, Pennsylvania since I was legally eligible to vote.

6. I started voting by mail in the last few years because I wanted to send a message to our elected officials: I believe in mail-in voting and I think all voting should be done by mail, because I think they should be making it easier for everyone to vote. I am the grandson of an immigrant and I believe that voting gives the people a chance to speak their minds; it's the foundation of our country. Instead, we see these efforts to not count certain ballots.

7. Voting means everything to me. It gives me a voice and allows me to

make sure my elected officials' beliefs line up with my own views. I am very pro-labor and pro-union. I was always very active and involved with the unions during my career. I am also a gun-owner and support Second Amendment rights. I want to elect candidates who support those issues.

8. I vote regularly. I try to vote in every general and primary election. I might miss an election here and there, but I definitely vote in most elections.

9. I voted by mail this year. I requested and received a mail ballot from Warren County before the November 2022 election. I made sure to request it and send it back very early because the Postal System is slow, to ensure that it would be received by Election Day. If there was a problem with what I sent back, there would have been plenty of time for the problem to be corrected before Election Day.

10. After I received my ballot, I marked it, inserted it into the secrecy envelope and inserted that in the outer return envelope. I also signed the envelope. I think I dated it, but it might have been a date that someone deemed incorrect. I don't understand how the date can be invalid if it was received before Election Day.

11. After the election, I learned that the outer return envelope of my ballot was determined to have an "invalid date." Someone from the ACLU-PA called me because my name was on a list provided by the Warren County Board of Elections. No one from the County or the state contacted me about this issue. On Election Day, I had just assumed that my ballot was cast and didn't think there would be any problem.

12. If I had known there was a problem with my ballot, I would have corrected it. I have a bad back but I can still get around if I need to.

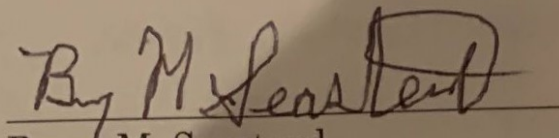
13. I feel upset about this situation. I think my voice should be heard. Voting

is the only chance I have to express my opinions about the issues that I care about. I am particularly upset because I strongly believe in mail-in voting. They should be making voting more accessible and easier for everyone. I'm very concerned about these ballots not being counted because of the lack of date or incorrect date. This is common sense: If you apply for a ballot, fill it out within the timeframe, and get it in before Election Day, your vote should be counted. I believe in free and fair elections, and don't like any effort that makes voting harder.

14. I think it's very important to vote and that everyone's voice is heard. I think everybody who votes should have their ballots counted. I would like my ballot counted for the November 2022 election.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23 of November, 2022 in Warren, Pennsylvania.


Barry M. Seastead